



UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2023 Grand Jury

UNITED STATES OF AMERICA,

ED CR 5:23-cr-00041-DSF

Plaintiff,

I N D I C T M E N T

v.

[18 U.S.C. § 1542: False Statement  
in a Passport Application;  
18 U.S.C. § 1028A(a)(1):  
Aggravated Identity Theft]

VICTOR MANUEL QUINTANA,

Defendant.

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1542]

On or about March 14, 2018, in San Bernardino County, within the Central District of California, defendant VICTOR MANUEL QUINTANA knowingly and willfully made a false statement in an application for a United States passport, with intent to induce and secure for his own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that, in such application, defendant QUINTANA stated that his name was E.S. and that his date of birth was in November 1967, whereas, in fact, as

1 defendant QUINTANA then knew, his name was not E.S. and his date of  
2 birth was not in November 1967.

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1 COUNT TWO

2 [18 U.S.C. § 1028A(a)(1)]

3 On or about March 14, 2018, in San Bernardino County, within the  
4 Central District of California, defendant VICTOR MANUEL QUINTANA  
5 knowingly possessed and used, without lawful authority, means of  
6 identification that defendant QUINTANA knew belonged to another  
7 person, namely, the name and birth date of victim E.S., during and in  
8 relation to the offense of False Statement in a Passport Application,  
9 a felony in violation of Title 18, United States Code, Section 1542,  
10 as charged in Count One of this Indictment.

11  
12 A TRUE BILL

13  
14 /s/  
15 Foreperson

16 E. MARTIN ESTRADA  
17 United States Attorney

18   
19 Scott M. Garringer  
Deputy Chief, Criminal Division For:  
20 MACK E. JENKINS  
Assistant United States Attorney  
Chief, Criminal Division

21 SEAN D. PETERSON  
22 Assistant United States Attorney  
Chief, Riverside Branch Office

23 MITCHELL M. SULIMAN  
24 Assistant United States Attorney  
Riverside Branch Office